

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
(Greenbelt Division)**

In re: TITI NOIMOT SONEKAN, Debtor.	Case No. 17-14327-LSS (Chapter 7)
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**UNITED STATES TRUSTEE’S MOTION TO EXTEND TIME
TO FILE COMPLAINT OBJECTING TO DISCHARGE**

Pursuant to Fed. R. Bankr. P. 9013 and 9014, Judy A. Robbins, United States Trustee for Region 4 (“United States Trustee”), by and through undersigned counsel, moves for the entry of an order extending the time to object to the Debtor’s discharge under 11 U.S.C. § 727 for 60 days, or, up to and including September 5, 2017.¹ In support, the United States Trustee states as follows:

1. Jurisdiction rests upon 28 U.S.C. § 1334, 28 U.S.C. § 157, and 11 U.S.C. § 307. The relief requested may be granted under Fed. R. Bankr. P. 4004(b), 9006(b)(1).
2. The United States Trustee has standing to appear and be heard on this matter under Section 307 of the Bankruptcy Code and takes this action pursuant to her administrative obligations under 28 U.S.C. § 586.
3. Pursuant to Local Bankr. R. 9013-6, the United States Trustee consents to entry of final orders or judgments by the Bankruptcy Court in this matter.
4. On March 29, 2017, debtor Titi Noimot Sonekan, *pro se*, initiated this case under the liquidation provisions of Chapter 7 of the United States Bankruptcy Code, 11 U.S.C. §§ 101 *et seq.* (the “Bankruptcy Code”).

5. Michael Wolff (“Chapter 7 Trustee”) was appointed to serve as Chapter 7 Trustee.

6. The deadline for objecting to discharge under Section 727 is Monday, July 3, 2017. (Dkt. 6.) Accordingly, under Fed. R. Bankr. P. 4004(b)(1), this motion is timely filed.

7. The Chapter 7 Trustee conducted the first meeting of creditors on May 2, 2017. However, the meeting was continued to June 6, 2017, so that this *pro se* Debtor could provide certain books and records.

8. After he received these documents, the Chapter 7 Trustee referred this case to the United States Trustee for further investigation.

9. The United States Trustee and the Debtor appeared at the June 6, 2017, continued 341 Meeting.

10. The materials provided to the Chapter 7 Trustee and the Debtor’s testimony on June 6 have raised significant questions about the Debtor’s entitlement to a discharge.

11. The Debtor is a Certified Public Accountant who has served as a Chief Financial Officer for several for-profit and non-profit entities.

12. Significantly, the Debtor appears to have failed to include critical information on her Schedules and Statement of Financial Affairs (“SOFA”). For instance, her tax returns indicate that she owns and manages two businesses. However, these businesses and their assets were not disclosed on her Schedules or SOFA.

13. After the 341 Meeting, the United States Trustee filed a Statement of Presumed Abuse. (Dkt. 12.) The motion to dismiss for abuse is due on or before July 17, 2017.

14. However, the investigation into a possible 727 action is ongoing.

¹ The 60th day falls on a weekend and Monday, September 4, is the Labor Day holiday.

15. The United States Trustee is requesting a 60-day extension to conduct and conclude her investigation into possible 727 issues and initiate an adversary proceeding if appropriate. Upon information and belief, the Debtor is actively seeking representation. An extension would permit the Debtor to retain counsel if desired, to file any amended pleadings, and to provide further information to the United States Trustee. This extension would benefit all parties.

16. Thus, to grant additional time to the United States Trustee to permit her to review the underlying facts of this case would be in the best interests of the creditors and the bankruptcy estate. Thus, the United States Trustee submits that good cause exists to extend the date to object to the Debtor's discharge up to and including September 5, 2017.

17. Pursuant to Local Rule 9013-2, the United States Trustee shall rely upon this motion and no further memorandum in support shall be filed.

WHEREFORE, for good cause shown, the United States Trustee respectfully requests that the Court enter an Order extending the deadline for filing a complaint objecting to the Debtor's discharge under 11 U.S.C. § 727 up to and including September 5, 2017; and awarding such other and further relief as this Court deems necessary and appropriate.

Date: June 30, 2017

Respectfully submitted,

JUDY A. ROBBINS

United States Trustee for Region 4

By Counsel:

/s/ Jeanne M. Crouse

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 30, 2017, I caused a true and correct copy of the United States Trustee's Motion to Extend Time to File Complaint Objecting to Discharge, and proposed Order, to be served:

By ECF Notification Immediately Upon Filing of Pleading On:

- Kyle J. Moulding bankruptcymd@mwc-law.com
- Michael G. Wolff trustee@wolawgroup.com,
 mwolff@ecf.epiqsystems.com; dgodfrey@wolawgroup.com

And By First-Class U.S. Mail, Postage Pre-Paid On:

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Debtor.

/s/ Jeanne M. Crouse
Jeanne M. Crouse